

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

NIR WEISS

Plaintiff/Counter-Defendant,

v.

THE SUKKAH COMPANY, LLC, MICHA KAPLAN,

Defendants/Counterclaimants.

Case No. 1:20-cv-04678-FB-RLM

**STIPULATED RULE 502(d)
AGREEMENT AND ORDER**

1. The production of privileged or work-product protected documents, electronically stored information (“ESI”) or information, whether inadvertent or otherwise, is not a waiver of the privilege or protection from discovery in this case or any other federal or state proceeding. This Order shall be interpreted to provide the maximum protection allowed by Federal Rules of Evidence 502(d).

2. Nothing contained herein is intended to or shall serve to limit a party’s right to conduct a review of documents, ESI or information (including metadata) for relevance, responsiveness and/or segregation of privileged and/or protected information before production.

IT IS SO ORDERED on this _____ day of _____, 2021.

By: _____
Hon. Frederic Block
United States District Judge

STIPULATED AND AGREED TO:

By: /s/Brett Evan Lewis Dated: April 30, 2021
Brett Evan Lewis
Lauren Valli
LEWIS & LIN, LLC
77 Sands Street, 6th Floor
Brooklyn, New York 11201
Telephone: (718) 243-9323
Facsimile: (718) 243-9326
E-mails: brett@iLawco.com
lauren@iLawco.com

Attorneys for Plaintiff/Counter-Defendant

By: /s/Ben D Manevitz/ Dated: April 25, 2021
Ben D. Manevitz
Manevitz Law Firm LLC
301 Route 17 North
Suite 800
Rutherford, NJ 07070
Telephone: (973) 594-6529
Facsimile: (973) 689-9529
E-mail: ben@manevitzlaw.com

Attorneys for Defendants/Counterclaimants